

# **EXHIBIT 13**

---

**From:** Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>  
**Sent:** Wednesday, November 6, 2024 7:35 PM  
**To:** Ted Goodman  
**Cc:** Nathan, Aaron E.  
**Subject:** Freeman v. Giuliani - Delinquent Information Subpoena  
**Attachments:** 2024.08.05 Information Subpoena with Restraining Notice (Ted Goodman; Arlington, VA).pdf

Ted,

I am writing regarding the information subpoena and restraining notice we served upon you via certified mail, delivered August 8, 2024, and personally in the lobby of 787 Seventh Avenue on September 10, 2024. A copy of which is attached here. C.P.L.R. § 5224(a)(3) provides that answers shall be returned together with the original of the questions within seven days after receipt. We are long past 7 days from either August 8 or September 10, but we have not received any response from you.

Please promptly advise whether you intend to return any response. If we do not hear from you by Monday, November 11 at noon, we will plan to file a motion to compel your compliance.

Thank you,  
Annie

**M.Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: [+1 212 728 8164](tel:+12127288164) | Fax: +1 212 728 9164  
[mhoughton-larsen@willkie.com](mailto:mhoughton-larsen@willkie.com) | [vCard](#) | [www.willkie.com/bio](http://www.willkie.com/bio)  
Pronouns: she, her, hers